

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

DEBORAH FRAME-WILSON, *et al.*, on  
behalf of themselves and all other similarly  
situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

CHRISTOPHER BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation,

Defendant.

No. 2:21-cv-00693-JHC

**STIPULATED MOTION AND ORDER  
REGARDING SEALING OF MOTION TO  
COMPEL BRIEFING**

**NOTE ON MOTION CALENDAR:**

August 19, 2024

No. 2:20-cv-00424-JHC

No. 2:22-cv-00965-JHC

1 The Parties have met and conferred with respect to the upcoming briefing on Plaintiffs'  
2 Motion to Compel, and anticipate that their briefs, declarations, and exhibits will quote from  
3 and/or describe in detail a significant amount of information that has been designated as  
4 Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order to  
5 ensure that such materials are treated appropriately under the applicable protective order, and to  
6 reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective  
7 counsel, hereby stipulate and agree to the following procedure for filing and sealing in  
8 connection with the motion to compel briefing, subject to the Court's approval.

9 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its briefs  
10 (including any opening, response, and reply briefs), declarations, exhibits, and all other evidence  
11 and declarations on which that Party relies (collectively, "Motion to Compel Papers") which  
12 contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by  
13 Amazon.

14 2. Within two weeks of the filing of Plaintiffs' reply brief, pursuant to LCR 5(g), the  
15 Parties will meet and confer and, as appropriate, file (1) public versions of their Motion to  
16 Compel Papers, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to  
17 LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction) shall be the  
18 movant for purposes of any such motion(s) to seal associated with the Parties' Motion to Compel  
19 Papers.

20 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.  
21  
22  
23  
24  
25  
26  
27  
28

1 DATED August 19, 2024.

Respectfully submitted,

2 HAGENS BERMAN SOBOL SHAPIRO LLP

3 By: /s/ Steve W. Berman

4 Steve W. Berman (WSBA No. 12536)

5 By: /s/ Barbara A. Mahoney

6 Barbara A. Mahoney (WSBA No. 31845)

1301 Second Avenue, Suite 2000

Seattle, WA 98101

7 Telephone: (206) 623-7292

8 Facsimile: (206) 623-0594

Email: [steve@hbsslaw.com](mailto:steve@hbsslaw.com)

[barbaram@hbsslaw.com](mailto:barbaram@hbsslaw.com)

9 Anne F. Johnson (*pro hac vice*)

10 594 Dean Street, Suite 24

11 Brooklyn, NY 11238

12 Telephone: (718) 916-3520

Email: [annej@hbsslaw.com](mailto:annej@hbsslaw.com)

13 KELLER POSTMAN LLC

14 Zina G. Bash (*pro hac vice*)

15 111 Congress Avenue, Suite 500

Austin, TX 78701

16 Telephone: (512) 690-0990

Email: [zina.bash@kellerpostman.com](mailto:zina.bash@kellerpostman.com)

17 Jessica Beringer (*pro hac vice*)

18 Shane Kelly (*pro hac vice*)

19 150 North Riverside Plaza, Suite 4100

Chicago, IL 60606

20 Telephone: (312) 741-5220

Email: [Jessica.Beringer@kellerpostman.com](mailto:Jessica.Beringer@kellerpostman.com)

21 Email: [shane.kelly@kellerpostman.com](mailto:shane.kelly@kellerpostman.com)

22 *Interim Co-Lead Counsel for Plaintiffs*  
23 *and the proposed Class*  
24  
25  
26  
27  
28

DAVIS WRIGHT TREMAINE LLP

By: /s/ John A. Goldmark

John A. Goldmark, WSBA #40980

By: /s/ MaryAnn Almeida

MaryAnn Almeida, WSBA #49086

920 Fifth Avenue, Suite 3300

Seattle, WA 98104-1610

Telephone: (206) 622-3150

Email: JohnGoldmark@dwt.com

Email: MaryAnnAlmeida@dwt.com

PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP

Karen L. Dunn (*pro hac vice*)

William A. Isaacson (*pro hac vice*)

Amy J. Mauser (*pro hac vice*)

Martha L. Goodman (*pro hac vice*)

Kyle Smith (*pro hac vice*)

2001 K Street, NW

Washington, D.C. 20006-1047

Telephone: (202) 223-7300

Email: kdunn@paulweiss.com

Email: wisaacson@paulweiss.com

Email: amausser@paulweiss.com

Email: mgoodman@paulweiss.com

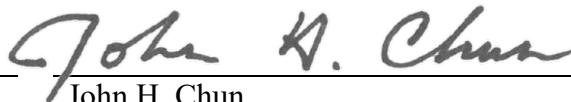
Email: ksmith@paulweiss.com

*Attorneys for Defendant Amazon.com, Inc.*

1 IT IS SO ORDERED.

2  
3 August 19, 2024

4 Dated



John H. Chun  
United States District Judge